

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	05-CV-0329 GKF-SAJ
)	
TYSON FOODS, INC., <i>et al.</i>)	
)	
Defendants.)	
)	

DEFENDANTS CARGILL, INC.'S AND CARGILL TURKEY PRODUCTION, LLC'S
NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFFS
REGARDING ALLEGED POLLUTANTS OR CONTAMINANTS

TC: W. A. Drew Edmondson
Attorney General
Kelly Hunter Burch
J. Trevor Hammons
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st Street
Oklahoma City, OK 73105

&

M. David Riggs, Joseph P. Lennart,
Richard T. Garren, Douglas A. Wilson,
Sharon K. Weaver, Robert A. Nance,
D. Sharon Gentry
Riggs Abney Neal Turpen Orbison & Lewis
502 West Sixth Street
Tulsa, OK 74119

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J. Randall Miller
Louis W. Bullock
Miller Keffler & Bullock
222 S. Kenosha
Tulsa, OK 74120-2421

&



David P. Page
Bell Legal Group
222 S. Kenosha
Tulsa, OK 7412

&

Frederick C. Baker
Lee M. Heath
Elizabeth C. Ward
Elizabeth Claire Xidis
Motley Rice, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465

&

William H. Narvold
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103

You are hereby notified that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Cargill, Inc. and Cargill Turkey Production, LLC will take the oral deposition of the Plaintiffs, by and through their duly designated representative(s) at the offices of Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 W. 6th St., Tulsa, Oklahoma, 74119 on **September 3, 2007, beginning at 9:00 a.m.** and continuing from day to day until completed, before an officer authorized by law to take depositions and administer oaths and videographer on those matters set forth in the Attached Exhibit A.

This deposition is being taken for the purpose of discovery and for use at trial as well as for any other purposes permitted by law.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: /s/ John H. Tucker (OBA #9110)

JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
THERESA NOBLE HILL, OBA #19119
100 W. Fifth Street, Suite 400 (74103-4287)
P.O. Box 21100
Tulsa, Oklahoma 74121-1100
Telephone: 918/582-1173
Facsimile: 918/592-3390

And

DELMAR R. EHRLICH
BRUCE JONES
DARA D. MANN
FAEGRE & BENSON LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
Telephone: 612/766-7000
Facsimile: 612/766-1600

ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY
PRODUCTION LLC

RULE 30(b)(6) NOTICE – EXHIBIT A

I. Definitions

“Alleged Pollutant or Contaminant” means any hazardous substance, pollutant, contaminant or other material alleged by You to have harmed the Illinois River Watershed as a result of poultry industry operations, including but not limited to phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens.

“Cargill Defendants” means Cargill, Inc., Cargill Turkey Production, LLC and their affiliated companies, subsidiaries or divisions, and any employee, attorney, agent or other representative thereof.

“Illinois River Watershed” or “IRW” means the area referenced by Hydrologic Unit Code 11110103 which is geographically bounded by the Illinois River water basin down to and including Lake Tenkiller.

“You” and “Your” means the State of Oklahoma, W.A. Drew Edmondson in his capacity as Attorney General of the State of Oklahoma, and the Oklahoma Secretary of the Environment C. Miles Tolbert in his capacity as Trustee for National Resources for the State of Oklahoma, including any agency, division, office, employee, attorney, agent or other representative thereof.

II. Areas of Inquiry:

1. Your first knowledge or awareness that, specifically, the operations of the Cargill Defendants or their contract growers might be a potential source of Alleged Pollutants or Contaminants;
2. The constituents or components of poultry litter / poultry waste specifically generated by the Cargill Defendants or their contract growers alleged to have harmed the environment of the IRW;
3. The constituents or components of poultry litter / poultry waste specifically generated by the Cargill Defendants or their contract growers alleged to have harmed human health in the IRW;
4. The damage, injury or harm to the IRW, if any, that is specifically attributable to the improper poultry litter / poultry waste disposal practices of the Cargill Defendants or their contract growers;

5. The costs, if any, incurred by You to remediate damage, injury or harm to the IRW specifically attributable to the alleged improper poultry litter / poultry waste disposal practices of the Cargill Defendants or their contract growers;
6. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1 through 5 above and Your understanding of the substance of said persons' knowledge;
7. To the extent You are unable to identify a designee(s) with regard Topics 1 through 6 above, the reasons You are unable to identify a designee(s); and
8. To the extent You are unable to respond to Topics 1 through 5 above with information specific to the Cargill Defendants or their contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to the Cargill Defendants or their contract growers.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, <i>et al.</i>)	
)	
Plaintiffs,)	
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v.)	05-CV-0329 GKF-SAJ
)	
TYSON FOODS, INC., <i>et al.</i>)	
)	
Defendants.)	
)	

DEFENDANTS CARGILL, INC.'S AND CARGILL TURKEY PRODUCTION, LLC'S
NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFFS
REGARDING ALLEGED RUNOFF OR RELEASES

TO: W. A. Drew Edmondson
Attorney General
Kelly Hunter Burch
J. Trevor Hammons
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st Street
Oklahoma City, OK 73105

&

M. David Riggs, Joseph P. Lennart,
Richard T. Garren, Douglas A. Wilson,
Sharon K. Weaver, Robert A. Nance,
D. Sharon Gentry
Riggs Abney Neal Turpen Orbison & Lewis
502 West Sixth Street
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J. Randall Miller
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222 S. Kenosha
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David P. Page
Bell Legal Group
222 S. Kenosha
Tulsa, OK 7412

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Frederick C. Baker
Lee M. Heath
Elizabeth C. Ward
Elizabeth Claire Xidis
Motley Rice, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465

&

William H. Narvold
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103

You are hereby notified that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Cargill, Inc. and Cargill Turkey Production, LLC will take the oral deposition of the Plaintiffs, by and through their duly designated representative(s) at the offices of Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 W. 6th St., Tulsa, Oklahoma, 74119 on **September 4, 2007, beginning at 9:00 a.m.** and continuing from day to day until completed, before an officer authorized by law to take depositions and administer oaths and videographer on those matters set forth in the Attached Exhibit A.

This deposition is being taken for the purpose of discovery and for use at trial as well as for any other purposes permitted by law.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: /s/ John H. Tucker (OBA #9110)

JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
THERESA NOBLE HILL, OBA #19119
100 W. Fifth Street, Suite 400 (74103-4287)
P.O. Box 21100
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Telephone: 918/582-1173
Facsimile: 918/592-3390

And

DELMAR R. EHRICH
BRUCE JONES
DARA D. MANN
FAEGRE & BENSON LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
Telephone: 612/766-7000
Facsimile: 612/766-1600

ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY
PRODUCTION LLC

RULE 30(b)(6) NOTICE – EXHIBIT A

I. Definitions

“Alleged Pollutant or Contaminant” means any hazardous substance, pollutant, contaminant or other material alleged by You to have harmed the Illinois River Watershed as a result of poultry industry operations, including but not limited to phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens.

“Cargill Defendants” means Cargill, Inc., Cargill Turkey Production, LLC and their affiliated companies, subsidiaries or divisions, and any employee, attorney, agent or other representative thereof.

“Illinois River Watershed” or “IRW” means the area referenced by Hydrologic Unit Code 11110103 which is geographically bounded by the Illinois River water basin down to and including Lake Tenkiller.

“You” and “Your” means the State of Oklahoma, W.A. Drew Edmondson in his capacity as Attorney General of the State of Oklahoma, and the Oklahoma Secretary of the Environment C. Miles Tolbert in his capacity as Trustee for National Resources for the State of Oklahoma, including any agency, division, office, employee, attorney, agent or other representative thereof.

II. Areas of Inquiry:

1. The dates, locations and manner in which the Cargill Defendants or their contract growers have failed to properly manage, store or dispose of their poultry litter / poultry waste;
2. The specific poultry litter / poultry waste management practices of the Cargill Defendants or their contract growers alleged to have caused runoff or releases of Alleged Pollutants or Contaminants;
3. The location and ownership of the real property that You allege was harmed or impacted by the actions of the Cargill Defendants or their contract growers;
4. Each instance of runoff or releases of Alleged Pollutants or Contaminants known or alleged by You to have occurred from property owned, managed or controlled by the Cargill Defendants or their contract growers;
5. The areas in which Alleged Pollutants or Contaminants have come to be located as a result of runoff or releases from property owned, managed or controlled by the Cargill Defendants or their contract growers;

6. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1 through 5 above and Your understanding of the substance of said persons' knowledge;
7. To the extent You are unable to identify a designee(s) with regard Topics 1 through 6 above, the reasons You are unable to identify a designee(s); and
8. To the extent You are unable to respond to Topics 1 through 5 above with information specific to the Cargill Defendants or their contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to the Cargill Defendants or their contract growers.

JB us 2242013.01

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, <i>et al.</i>)	
)	
Plaintiffs.)	
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v.)	05-CV-0329 GKF-SAJ
)	
TYSON FOODS, INC., <i>et al.</i>)	
)	
Defendants.)	
)	

DEFENDANTS CARGILL, INC.'S AND CARGILL TURKEY PRODUCTION, LLC'S
NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFFS
REGARDING ALLEGED LEGAL VIOLATIONS

TO: W. A. Drew Edmondson
Attorney General
Kelly Hunter Burch
J. Trevor Hammons
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st Street
Oklahoma City, OK 73105

&

M. David Riggs, Joseph P. Lennart,
Richard T. Garren, Douglas A. Wilson,
Sharon K. Weaver, Robert A. Nance,
D. Sharon Gentry
Riggs Abney Neal Turpen Orbison & Lewis
502 West Sixth Street
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J. Randall Miller
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David P. Page
Bell Legal Group
222 S. Kenosha
Tulsa, OK 7412

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Frederick C. Baker
Lee M. Heath
Elizabeth C. Ward
Elizabeth Claire Xidis
Motley Rice, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465

&

William H. Narwold
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103

You are hereby notified that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Cargill, Inc. and Cargill Turkey Production, LLC will take the oral deposition of the Plaintiffs, by and through their duly designated representative(s) at the offices of Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 W. 6th St., Tulsa, Oklahoma, 74119 on **September 5, 2007, beginning at 9:00 a.m.** and continuing from day to day until completed, before an officer authorized by law to take depositions and administer oaths and videographer on those matters set forth in the Attached Exhibit A.

This deposition is being taken for the purpose of discovery and for use at trial as well as for any other purposes permitted by law.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: /s/ John H. Tucker (OBA #9110)

JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
THERESA NOBLE HILL, OBA #19119
100 W. Fifth Street, Suite 400 (74103-4287)
P.O. Box 21100
Tulsa, Oklahoma 74121-1100
Telephone: 918/582-1173
Facsimile: 918/592-3390

And

DELMAR R. EHRLICH
BRUCE JONES
DARA D. MANN
FAEGRE & BENSON LLP
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90 South Seventh Street
Minneapolis, Minnesota 55402
Telephone: 612/766-7000
Facsimile: 612/766-1600

ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY
PRODUCTION LLC

RULE 30(b)(6) NOTICE – EXHIBIT A

I. Definitions

“Alleged Pollutant or Contaminant” means any hazardous substance, pollutant, contaminant or other material alleged by You to have harmed the Illinois River Watershed as a result of poultry industry operations, including but not limited to phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens.

“Cargill Defendants” means Cargill, Inc., Cargill Turkey Production, LLC and their affiliated companies, subsidiaries or divisions, and any employee, attorney, agent or other representative thereof.

“Illinois River Watershed” or “IRW” means the area referenced by Hydrologic Unit Code 11110103 which is geographically bounded by the Illinois River water basin down to and including Lake Tenkiller.

“You” and “Your” means the State of Oklahoma, W.A. Drew Edmondson in his capacity as Attorney General of the State of Oklahoma, and the Oklahoma Secretary of the Environment C. Miles Tolbert in his capacity as Trustee for National Resources for the State of Oklahoma, including any agency, division, office, employee, attorney, agent or other representative thereof.

II. Areas of Inquiry:

1. The specific actions of the Cargill Defendants or their contract growers alleged to have violated the laws, rules or regulations of the United States or the State of Oklahoma;
2. The pollution of the air, land or waters of the State of Oklahoma specifically arising from the actions of the Cargill Defendants or their contract growers;
3. The specific actions of the Cargill Defendants or their contract growers alleged to have resulted in nuisance(s) and the nature of the alleged nuisance(s);
4. The specific actions of the Cargill Defendants or their contract growers alleged to have resulted in trespass(es) and the nature of the alleged trespass(es);
5. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1 through 4 above and Your understanding of the substance of said persons’ knowledge;

6. To the extent You are unable to identify a designee(s) with regard Topics 1 through 5 above, the reasons You are unable to identify a designee(s); and
7. To the extent You are unable to respond to Topics 1 through 5 above with information specific to the Cargill Defendants or their contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to the Cargill Defendants or their contract growers.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	05-CV-0329 GKF-SAJ
)	
TYSON FOODS, INC., <i>et al.</i>)	
)	
Defendants.)	
)	

DEFENDANTS CARGILL, INC.'S AND CARGILL TURKEY PRODUCTION, LLC'S
NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFFS
REGARDING GROWER INTERACTION

TO: W. A. Drew Edmondson
Attorney General
Kelly Hunter Burch
J. Trevor Hammons
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st Street
Oklahoma City, OK 73105

&

M. David Riggs, Joseph P. Lennart,
Richard T. Garren, Douglas A. Wilson,
Sharon K. Weaver, Robert A. Nance,
D. Sharon Gentry
Riggs Abney Neal Turpen Orbison & Lewis
502 West Sixth Street
Tulsa, OK 74119

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J. Randall Miller
Louis W. Bullock
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222 S. Kenosha
Tulsa, OK 74120-2421

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David P. Page
Bell Legal Group
222 S. Kenosha
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Frederick C. Baker
Lee M. Heath
Elizabeth C. Ward
Elizabeth Claire Xidis
Motley Rice, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465

&

William H. Narwold
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103

You are hereby notified that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Cargill, Inc. and Cargill Turkey Production, LLC will take the oral deposition of the Plaintiffs, by and through their duly designated representative(s) at the offices of Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 W. 6th St., Tulsa, Oklahoma, 74119 on **September 6, 2007, beginning at 9:00 a.m.** and continuing from day to day until completed, before an officer authorized by law to take depositions and administer oaths and videographer on those matters set forth in the Attached Exhibit A.

This deposition is being taken for the purpose of discovery and for use at trial as well as for any other purposes permitted by law.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: /s/ John H. Tucker (OBA #9110)

JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
THERESA NOBLE HILL, OBA #19119
100 W. Fifth Street, Suite 400 (74103-4287)
P.O. Box 21100
Tulsa, Oklahoma 74121-1100
Telephone: 918/582-1173
Facsimile: 918/592-3390

And

DELMAR R. EHRICH
BRUCE JONES
DARA D. MANN
FAEGRE & BENSON LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
Telephone: 612/766-7000
Facsimile: 612/766-1600

ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY
PRODUCTION LLC

RULE 30(b)(6) NOTICE – EXHIBIT A

I. Definitions

“Alleged Pollutant or Contaminant” means any hazardous substance, pollutant, contaminant or other material alleged by You to have harmed the Illinois River Watershed as a result of poultry industry operations, including but not limited to phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens.

“Cargill Defendants” means Cargill, Inc., Cargill Turkey Production, LLC and their affiliated companies, subsidiaries or divisions, and any employee, attorney, agent or other representative thereof.

“Illinois River Watershed” or “IRW” means the area referenced by Hydrologic Unit Code 11110103 which is geographically bounded by the Illinois River water basin down to and including Lake Tenkiller.

“You” and “Your” means the State of Oklahoma, W.A. Drew Edmondson in his capacity as Attorney General of the State of Oklahoma, and the Oklahoma Secretary of the Environment C. Miles Tolbert in his capacity as Trustee for National Resources for the State of Oklahoma, including any agency, division, office, employee, attorney, agent or other representative thereof.

II. Areas of Inquiry:

1. The contractual relationship between the Cargill Defendants and their contract growers;
2. The alleged “domination and control” of the Cargill Defendants of their contract growers;
3. The Cargill Defendants’ alleged responsibility for poultry litter / poultry waste created as a result of their contract growers’ operations;
4. The Cargill Defendants’ responsibility, if any, for poultry litter / poultry waste created as a result of poultry industry operations not owned by the Cargill Defendants or their contract growers;
5. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1 through 4 above and Your understanding of the substance of said persons’ knowledge;
6. To the extent You are unable to identify a designee(s) with regard Topics 1 through 5 above, the reasons You are unable to identify a designee(s); and

7. To the extent You are unable to respond to Topics 1 through 4 above with information specific to the Cargill Defendants or their contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to the Cargill Defendants or their contract growers.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	05-CV-0329 GKF-SAJ
)	
TYSON FOODS, INC., <i>et al.</i>)	
)	
Defendants.)	
)	

DEFENDANTS CARGILL, INC.'S AND CARGILL TURKEY PRODUCTION, LLC'S
NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFFS
REGARDING ALLEGED HUMAN HEALTH HAZARDS

TO: W. A. Drew Edmondson
Attorney General
Kelly Hunter Burch
J. Trevor Hammons
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st Street
Oklahoma City, OK 73105

&

M. David Riggs, Joseph P. Lennart,
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William H. Narwold
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103

You are hereby notified that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure, Defendants Cargill, Inc. and Cargill Turkey Production, LLC will take the oral deposition of the Plaintiffs, by and through their duly designated representative(s) at the offices of Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 W. 6th St., Tulsa, Oklahoma, 74119 on **September 7, 2007, beginning at 9:00 a.m.** and continuing from day to day until completed, before an officer authorized by law to take depositions and administer oaths and videographer on those matters set forth in the Attached Exhibit A.

This deposition is being taken for the purpose of discovery and for use at trial as well as for any other purposes permitted by law.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY: /s/ John H. Tucker (OBA #9110)

JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
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100 W. Fifth Street, Suite 400 (74103-4287)
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ATTORNEYS FOR CARGILL, INC. AND CARGILL TURKEY
PRODUCTION LLC

RULE 30(b)(6) NOTICE – EXHIBIT A

I. Definitions

“Alleged Pollutant or Contaminant” means any hazardous substance, pollutant, contaminant or other material alleged by You to have harmed the Illinois River Watershed as a result of poultry industry operations, including but not limited to phosphorous / phosphorus compounds, nitrogen / nitrogen compounds, arsenic / arsenic compounds, zinc / zinc compounds, copper / copper compounds, hormones, and/or microbial pathogens.

“Cargill Defendants” means Cargill, Inc., Cargill Turkey Production, LLC and their affiliated companies, subsidiaries or divisions, and any employee, attorney, agent or other representative thereof.

“Illinois River Watershed” or **“IRW”** means the area referenced by Hydrologic Unit Code 11110103 which is geographically bounded by the Illinois River water basin down to and including Lake Tenkiller.

“You” and **“Your”** means the State of Oklahoma, W.A. Drew Edmondson in his capacity as Attorney General of the State of Oklahoma, and the Oklahoma Secretary of the Environment C. Miles Tolbert in his capacity as Trustee for National Resources for the State of Oklahoma, including any agency, division, office, employee, attorney, agent or other representative thereof.

II. Areas of Inquiry:

1. The human health hazards specifically caused by poultry litter : poultry waste generated by the Cargill Defendants or their contract growers;
2. The specific actions of the Cargill Defendants or their contract growers alleged to constitute “unreasonable and substantial danger to the public’s health and safety”;
3. The names and addresses of all individuals who have or may sustain health conditions specifically caused by poultry litter : poultry waste generated by the Cargill Defendants or their contract growers;
4. The names and contact information of all persons known or alleged by You to have factual information relevant to Topics 1 through 3 above and Your understanding of the substance of said persons’ knowledge;
5. To the extent You are unable to identify a designee(s) with regard Topics 1 through 4 above, the reasons You are unable to identify a designee(s), and

6. To the extent You are unable to respond to Topics 1 through 3 above with information specific to the Cargill Defendants or their contract growers (as opposed to information / actions of the poultry industry generally), the reasons You are unable to provide information specific to the Cargill Defendants or their contract growers.

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